

**Draft Recertification Application
for the
Waste Isolation Pilot Plant**

The Department of Energy (DOE) has provided the Environmental Protection Agency (EPA) with a draft version of the application that EPA will consider in its recertification decision for the Waste Isolation Pilot Plant (WIPP). EPA is making this draft application available to the public in hopes of facilitating review of the final recertification application. DOE will submit the final recertification application to EPA no later than March 26, 2004. EPA does not expect significant changes from this draft version in the final recertification application.

To assist the public in its review, EPA provides the following summary of the contents of the draft recertification application documents, its applicability to EPA's WIPP regulations, and highlights of changes since 1998. Although EPA is also reviewing the draft recertification materials, we have not made any decisions regarding WIPP recertification based on this draft documentation.

Once EPA receives the final recertification application, you will be able to view the documents by downloading them from our website (www.epa.gov/radiation/wipp) or obtaining them from one of our four public docket locations in New Mexico and in Washington, DC. Upon receiving the final recertification application, EPA will open a public comment period of at least 120 days. During this time, EPA will be most interested in public input on issues where changes have occurred which may have a potential impact on the WIPP's ability to remain in compliance with our disposal regulations, as well as any areas where the public believes that changes have occurred at WIPP that have not been identified by DOE. If you wish to receive an e-mail notification when EPA posts the final application on our web-site (and for other significant EPA WIPP activities), you may sign up for our WIPP-NEWS email updates sending a blank email message (no subject line or text) to: wipp-news-subscribe@lists.epa.gov. Subscription details and other additional information on the WIPP-NEWS e-mail service will be posted on our website (<http://www.epa.gov/radiation/wipp>).

Guide to DOE's Draft Recertification Application

| Chapter | Title | Topics Covered in this Chapter: | EPA will use this chapter to determine compliance with these requirements: | Highlights of Changes since 1998 Certification Decision: |
|---------|-----------------------|------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Introduction | Background information and descriptions of applicable regulations. | 194.15 Content of the CRA 194.21 Inspections | Chapter 1 has been re-written to include EPA's 1998 Certification Decision. This Chapter also contains a summary of the changes since 1998 and a crosswalk with the original application. |
| 2 | Site Characterization | Site geology, surface and groundwater hydrology, climatic conditions, and seismic risk. | 194.15 Content of the CRA 194.45 Consideration of Presence of Resources | Chapter 2 contains updated geologic information, an updated table of the WIPP PA Scenario Screening, updates to Culebra Member studies and monitoring, and data on site conditions since 1998. |
| 3 | Facility Description | Describes the facility design and configuration and the disposal-system barriers. | 194.15 Content of the CRA 194.44 Engineered Barriers | Chapter 3 changes focus on EPA approval of changes to the utilization of some of the rooms in Panel 1, EPA approval to allow raising the repository horizon by 2 meters to Clay seam G, and EPA approval to eliminate MgO mini sacks and to change the MgO supplier. This Chapter also identifies DOE's intention to request a change to the panel closure system after recertification. |
| 4 | Waste Description | Describes the waste components, waste characterization techniques and the TRU waste inventory in the | 194.15 Content of the CRA 194.24 Waste Characterization | Chapter 4 updates the TRU waste inventory and the non-radionuclide inventory. This Chapter also summarizes the amount of waste emplaced at WIPP to date and projects the amount of waste still to come from each of the |

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| | | DOE complex. | | waste generator sites. This chapter provides a status of waste characterization activities for the generator sites and any corresponding EPA approvals. |
| 5 | Quality Assurance | Describes process that DOE uses to achieve and maintain quality assurance requirements | 194.22 Quality Assurance 194.23 Models and Computer Codes 194.24 Waste Characterization | DOE has re-written this chapter to incorporate program changes, improve the description of the characteristics and parameters of a QA program, and to clarify its implementation. |
| 6 | Containment Requirements | Describes the conceptual models, performance assessment, FEPs, scenario development and selection, and calculation of scenario consequences. | 194.15 Content of the CRA 194.22 Quality Assurance 194.23 Models and Computer Codes 194.24 Waste Characterization 194.25 Future State Assumptions 194.32 Scope of Performance Assessments 194.33 Consideration of Drilling Events 194.34 Results of Performance Assessments 194.45 Consideration of Presence of Resources 194.55 Results of Compliance Assessment | This Chapter discusses the new performance assessment that was conducted for recertification, including a re-assessment of Features Events and Processes that could impact WIPP's long-term performance. Examples of changes to the performance assessment include: using EPA specified values from the PAVT, and using the MODFLOW to better represent groundwater modeling. |
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| 7 | Assurance Requirements | Describes DOE plans for active and passive institutional controls, monitoring, engineered barriers, resource considerations, and waste removal. | 194.15 Content of the CRA 194.22 Quality Assurance 194.25 Future State Assumptions 194.41 Active Institutional Controls 194.42 Monitoring 194.43 Passive Institutional Controls 194.44 Engineered Barriers 194.45 Consideration of Presence of Resources 194.46 Removal of Waste | Chapter 7 provides new details about the implementation plan for active institutional controls and updates the passive institutional controls discussion to reflect EPA requirements. This chapter also provides the results of the compliance monitoring over the past 5 years. |
| 8 | Individual and Groundwater Protection Requirements | Discusses dose calculations for individual protection and groundwater standards. | 194.15 Content of the CRA 194.24 Waste Characterization 194.51 Consideration of Protected Individual 194.52 Consideration of Exposure Pathways 194.53 Consideration of Underground Sources of Drinking Water 194.54 Scope of the Compliance Assessment 194.55 Results of Compliance Assessment | Chapter 8 updates the maximum concentration of the radionuclides that are predicted to reach the accessible environment. No new dose calculations were made in the CRA. DOE did not identify any new information regarding the location of underground sources of drinking water near WIPP. |
| 9 | Peer-2004 | Describes peer review activities | 194.22 Quality Assurance | Chapter 9 has been re-written to more clearly |

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| | Review | for the original Certification as well as for Recertification. | 194.23 Models and Computer Codes 194.27 Peer Review | describe the peer review process, the peer reviews since the 1998 Certification for the spallings model and for the BRAGFLO computational grid. |